



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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ROD R. BLAGOJEVICH, GOVERNOR

DOUGLAS P. SCOTT, DIRECTOR

815-223-1714

January 16, 2008

EPA Region 5 Records Ctr.



303015

Mr. Keith Wilcoxson
SECOR International Incorporated
446 Eisenhower Lane North
Lombard, Illinois 60148

Refer to: 2010300074—Winnebago County
Southeast Rock Groundwater Contamination Site/
Hamilton Sundstrand, Area 9-10
Superfund/Technical Reports [GMZ letter]

Dear Mr. Wilcoxson

The Illinois Environmental Protection Agency (Illinois EPA) has reviewed the comments submitted by you on behalf of Hamilton Sundstrand ("H/S") dated November 29, 2007 (the "November 29th letter"). The November 29th letter was a response to an Illinois EPA letter dated February 28, 2007 (the "February 28th letter"). The February 28th letter contained Illinois EPA's comments on the Groundwater Management Zone ("GMZ") application that was submitted by H/S dated November 30, 2006. The February 28th letter detailed conditions necessary for the establishment of the Groundwater Management Zone (GMZ) pursuant to 35 Ill. Adm. Code 620.250. Additionally, two meetings have also been held with Illinois EPA and H/S to discuss conditions necessary for the establishment of the GMZ. Illinois EPA will make a determination on H/S's GMZ application upon receipt of responses to the additional comments contained herein.

1. Illinois EPA concurs that RCRA units may be closed pursuant to 35 Ill. Adm. Code Part 725. Specific requirements for the RCRA closure of units shall be addressed in a separate document. However, proper closure of these units will be required for compliance with 35 Ill. Adm. Code 620.250.
2. The groundwater monitoring program proposed in your Operation Maintenance and Monitoring Plan ("OM&M") fails to meet the requirements of 35 Ill. Adm. Code 620.250 and 35 Ill. Adm. Code Part 725 subpart F.

Your proposal to monitor only on an “as necessary” basis does not comply with 35 Ill. Adm. Code Parts 620 and 725, subpart F because exceedances of the ARARs Class I groundwater standards exist. The entire groundwater monitoring network shall be sampled at least semiannually while the GMZ is in effect, pursuant to the Statement of Work, Work and O&M plans.

3. Illinois EPA agrees that groundwater data from Area 11 is directly applicable to issues for Source Area 9/10. However, the request for soil data from source areas 11, 4, and 7, and for groundwater data from the entire SE Rockford Site, is inappropriate in a GMZ application. Such request shall be made pursuant to a FOIA request; additionally, this data should be available in the Administrative Record depository.
4. Illinois EPA is currently satisfied with the geologic information, 3D area description and scaled maps submitted with the original GMZ application. However, additional information may be required as new information is collected during implementation of the remedial action.
5. The solid waste management units (SWMU's) can be identified and shown later on a figure which may need to be incorporated into the GMZ documentation as information is obtained.
6. The vertical limit of the GMZ shall be stated in the document as well as the vertical limit of the air sparging equipment. We suggest that H/S include a diagram of the air sparging wells showing how the air sparging wells and the vertical limit of the GMZ interrelate.
7. Hamilton Sundstrand's response in the November 29th letter to comment 18 fails to address required elements of 35 Ill. Adm. Code Parts 620, 724 and 725 for the GMZ application, including:
 - a. Fails to meet the requirements of 35 Ill. Adm. Code 724.195 point of compliance, an ARAR for the ROD.
 - b. The use of monitored natural attenuation is not part of the remedy for Source Area 9/10 or any other Source Area. Page 82 of the ROD, entitled Ground Water Management Zones, states “Natural attenuation is part of the remedy only as it relates to groundwater beyond the Source Areas.” Further, natural attenuation is not corrective action that has been approved as required by 35 Ill. Adm. Code Part 620.
 - c. The OU2 ROD is not applicable for the actual remedial action of Source Areas of the OU3 ROD.
 - d. Fails to comply with 35 Ill. Adm. Code 725.190.
8. Monitored natural attenuation is a passive remedy not considered active corrective action and does not meet the closure requirements documented in RCRA permit

letters issued by Illinois EPA dated July 27, 1992 and May 7, 1993 pursuant to 35 Ill. Adm. Code Parts 724 and 725 for closure requirements of RCRA units.

9. Reports for the Groundwater Management Zone shall also be submitted on a semi-annual basis or more frequently as potentially required by conditions. These reports should be coordinated with the groundwater sampling so as to reflect the then current conditions present in the GMZ. In addition, information required to meet 35 Ill. Adm. Code Part 725, subpart F shall be included.
10. Establishment of background conditions shall, at a minimum, meet the requirements of 35 Ill. Adm. Code 725.192(c). Depending upon the results of the actual sampling events, additional quarterly monitoring may be required for the establishment of background.
11. Remedial action equipment was not included in the design documents for treatment of contamination located on the west boundary along 9th Street. Illinois EPA understands the logistical problems associated with the 9th Street boundary, however, this does not eliminate H/S's responsibility from fulfilling the requirements of the ROD signed in June of 2002 or requirements of the GMZ. We note that 35 Ill. Adm. Code 724.195(a) provides: "The Agency will specify in the facility permit the point of compliance at which the groundwater protection standard of Section 724.192 applies and at which monitoring shall be conducted. The point of compliance is a vertical surface located at the hydraulically down-gradient limit of waste management area that extends into the uppermost aquifer underlying the regulated units."
12. Illinois EPA and US.EPA will review the adequacy of the controls within the GMZ, and the remedial action, at least every 5 years as required by 35 Ill. Adm. Code 620.250 and CERCLA. The reviews will be based upon a written report(s) submitted by H/S as well as information collected by oversight contractors for Illinois EPA and US.EPA.
13. If concentrations specified in 35 Ill. Adm. Code 620.450(a)(4)(B) remain in groundwater after completion of the corrective action, the Agencies will continue to review the adequacy of the corrective action taken and any institutional control measures implemented.

Please provide the Illinois EPA with 3 copies your response within twenty-one (21) days of the date of this letter. Mail two copies to Springfield, Illinois and the third copy to Thomas C. Williams, LPG, Illinois EPA Project Manager, PO. Box 1515, LaSalle, Illinois 61301-3515. The Illinois EPA requests 14 days notification of all site investigations and remedial activities to coordinate oversight. If you have any questions, please feel free to contact me at 815-223-1714 or Terry Ayers at 217-524-3300.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas C. Williams". The signature is fluid and cursive, with a large initial "T" and "W".

Thomas C. Williams LPG.
National Priorities List Unit
Federal Sites Remediation Section
Division of Remedial Management
Bureau of Land

cc: Bureau of Land File
Terry Ayers NPL unit
Paul Jagiello DLC DesPlaines Regional Office
Shari Kolak SR6J US.EPA Region V Chicago, IL
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